

# Exhibit 59

**From:** [Christopher Geddis](#)  
**To:** [Priselac, Jessica](#)  
**Cc:** [Good, Rachel](#); [Adam Slater](#)  
**Subject:** FW: Valsartan: ZHP Parties Document Production ZHP052  
**Date:** Wednesday, February 9, 2022 5:11:00 PM  
**Attachments:** [2-9-2022 Cover Letter Regarding Document Production ZHP052.PDF](#)  
[ZHP Parties Production Index, 2-9-2022.XLSX](#)

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Hi Jessica,

Are any of these documents related to the Rule 37 sanctions motion?

Best,  
Chris

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**From:** Good, Rachel <RMGood@duanemorris.com>  
**Sent:** Wednesday, February 9, 2022 11:44 AM  
**To:** 'rhonik@golombhonik.com' <rhonik@golombhonik.com>; 'd.stanoch@kanner-law.com'  
<d.stanoch@kanner-law.com>; Adam Slater <ASlater@mazieslater.com>; 'dnigh@levinlaw.com'  
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<alexia.brancato@kirkland.com>; Klein, Alan <AKlein@duanemorris.com>; Goldberg, Seth A.  
<SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Bazan, Rebecca  
<REBazan@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>;  
'valsartan@csdisco.com' <valsartan@csdisco.com>; Cheryll Calderon <ccalderon@mazieslater.com>;  
Ashleigh Raso <araso@meshbesher.com>; Bonner, Kelly <KABonner@duanemorris.com>; 'Lars  
Myrabo' <myrabo@csdisco.com>  
**Subject:** Valsartan: ZHP Parties Document Production ZHP052

Counsel,

Please see the attached letter and production index.

Please let me know if you have any difficulty accessing the documents and  
overlay from the Aquipt document repository.

Best,

Rachel

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**From:** Good, Rachel  
**Sent:** Wednesday, February 2, 2022 5:59 PM  
**To:** 'rhonik@golombhonik.com' <[rhonik@golombhonik.com](mailto:rhonik@golombhonik.com)>; 'd.stanoch@kanner-law.com' <[d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com)>; 'aslater@mazieslater.com' <[aslater@mazieslater.com](mailto:aslater@mazieslater.com)>; 'dnigh@levinlaw.com' <[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)>; 'c.whiteley@kanner-law.com' <[c.whiteley@kanner-law.com](mailto:c.whiteley@kanner-law.com)>  
**Cc:** 'Behram Parekh' <[behram.parekh@drlawllp.com](mailto:behram.parekh@drlawllp.com)>; 'argenal@csdisco.com' <[argenal@csdisco.com](mailto:argenal@csdisco.com)>; 'valpec@kirtlandpackard.com' <[valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com)>; 'CohenL@gtlaw.com' <[CohenL@gtlaw.com](mailto:CohenL@gtlaw.com)>; 'cct@pietragallo.com' <[cct@pietragallo.com](mailto:cct@pietragallo.com)>; 'jpoletto@hkmpp.com' <[jpoletto@hkmpp.com](mailto:jpoletto@hkmpp.com)>; 'alexia.brancato@kirkland.com' <[alexia.brancato@kirkland.com](mailto:alexia.brancato@kirkland.com)>; Klein, Alan <[AKlein@duanemorris.com](mailto:AKlein@duanemorris.com)>; Goldberg, Seth A. <[SAGoldberg@duanemorris.com](mailto:SAGoldberg@duanemorris.com)>; Priselac, Jessica <[JPriselac@duanemorris.com](mailto:JPriselac@duanemorris.com)>; Bazan, Rebecca <[REBazan@duanemorris.com](mailto:REBazan@duanemorris.com)>; Hill, Coleen W. <[CWHill@duanemorris.com](mailto:CWHill@duanemorris.com)>; 'valsartan@csdisco.com' <[valsartan@csdisco.com](mailto:valsartan@csdisco.com)>; 'Cheryll Calderon' <[ccalderon@mazieslater.com](mailto:ccalderon@mazieslater.com)>; 'araso@meshbesher.com' <[araso@meshbesher.com](mailto:araso@meshbesher.com)>; Bonner, Kelly <[KABonner@duanemorris.com](mailto:KABonner@duanemorris.com)>; 'Lars Myrabo' <[myrabo@csdisco.com](mailto:myrabo@csdisco.com)>  
**Subject:** Valsartan: ZHP Parties Document Production ZHP051

Counsel,

Please see the attached letter and production index.

Please let me know if you have any difficulty accessing the documents and overlay from the Aquipt document repository.

Best,

Rachel

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**From:** Good, Rachel  
**Sent:** Friday, January 21, 2022 10:47 PM  
**To:** [rhonik@golombhonik.com](mailto:rhonik@golombhonik.com); [d.stanoch@kanner-law.com](mailto:d.stanoch@kanner-law.com); [aslater@mazieslater.com](mailto:aslater@mazieslater.com); [dnigh@levinlaw.com](mailto:dnigh@levinlaw.com); [c.whiteley@kanner-law.com](mailto:c.whiteley@kanner-law.com)  
**Cc:** Behram Parekh <[behram.parekh@drlawllp.com](mailto:behram.parekh@drlawllp.com)>; [argenal@csdisco.com](mailto:argenal@csdisco.com); [valpec@kirtlandpackard.com](mailto:valpec@kirtlandpackard.com); [CohenL@gtlaw.com](mailto:CohenL@gtlaw.com); [cct@pietragallo.com](mailto:cct@pietragallo.com); [jpoletto@hkmpp.com](mailto:jpoletto@hkmpp.com); [alexia.brancato@kirkland.com](mailto:alexia.brancato@kirkland.com); Klein, Alan <[AKlein@duanemorris.com](mailto:AKlein@duanemorris.com)>; Goldberg, Seth A. <[SAGoldberg@duanemorris.com](mailto:SAGoldberg@duanemorris.com)>; Priselac, Jessica <[JPriselac@duanemorris.com](mailto:JPriselac@duanemorris.com)>; Bazan, Rebecca <[REBazan@duanemorris.com](mailto:REBazan@duanemorris.com)>; Hill, Coleen W. <[CWHill@duanemorris.com](mailto:CWHill@duanemorris.com)>; [valsartan@csdisco.com](mailto:valsartan@csdisco.com); Cheryll Calderon <[ccalderon@mazieslater.com](mailto:ccalderon@mazieslater.com)>; [araso@meshbesher.com](mailto:araso@meshbesher.com); Bonner, Kelly <[KABonner@duanemorris.com](mailto:KABonner@duanemorris.com)>; Lars Myrabo <[myrabo@csdisco.com](mailto:myrabo@csdisco.com)>; Good, Rachel